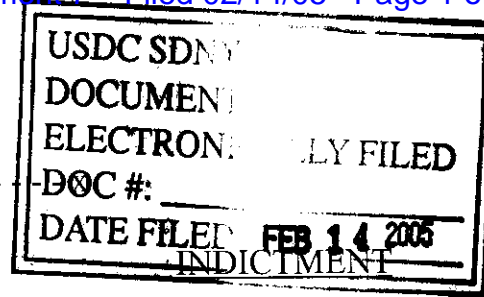


12 B

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK



UNITED STATES OF AMERICA,

- v. -

NOORULLAH ZADRAN

S1 04 Cr. 1185 (LAP)

Defendant.

X

COUNTS ONE THROUGH FOUR  
(Subscribing to False Income Tax Returns)

The Grand Jury charges:

1. On or about the dates set forth below, in the Southern District of New York, the Eastern District of New York, and elsewhere, NOORULLAH ZADRAN, the defendant, unlawfully, willfully and knowingly did make and subscribe U.S. Individual Income Tax Returns, Forms 1040 and 1040PC, for himself and his wife for the tax years set forth below, which returns contained and were verified by the written declaration of NOORULLAH ZADRAN that they were made under the penalties of perjury, and which returns NOORULLAH ZADRAN did not believe to be true and correct as to every material matter, in that NOORULLAH ZADRAN, the defendant, failed to report on his income tax returns all of the salary and other income that he received in the course of his employment by the New York Mission of the Islamic Emirate of Afghanistan, located in Flushing, New York, as set forth below:

COUNT	TAX YEAR	APPROXIMATE DATE OF FILING
1	1998	timely filed on or before April 15, 1999
2	1999	timely filed on or before April 15, 2000
3	2000	timely filed on or before April 15, 2001
4	2001	filed on or about September 23, 2002

(Title 26, United States Code, Section 7206(l).)

COUNT FIVE

(Conspiracy to Commit Bank Fraud)

The Grand Jury further charges:

2. From in or about February 2001, up to and including in or about July 2001, in the Southern District of New York, the Eastern District of New York, and elsewhere, NOORULLAH ZADRAN, the defendant, with others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate and agree together and with each other to violate the laws of the United States, to wit, Title 18, United States Code, Section 1344.

3. It was a part and an object of the conspiracy that NOORULLAH ZADRAN, the defendant, and others known and unknown, unlawfully, willfully, and knowingly would and did execute and attempt to execute a scheme and artifice to defraud a financial institution, to wit, Indymac Bank F.S.B. (through U.S. Mortgage Corporation d/b/a Mortgage Concepts, a mortgage banking corporation), which was then insured by the Federal Deposit Insurance Corporation, and to obtain money, funds, credits, assets, securities and other property owned by and under the custody of said financial institution, by means of

false and fraudulent pretenses, representations and promises, in violation of Title 18, United States Code, Section 1344.

OVERT ACTS

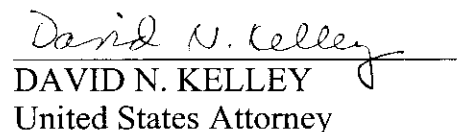
4. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York, Eastern District of New York, and elsewhere:

a. In or about March 2001, NOORULLAH ZADRAN, the defendant, recruited a co-conspirator not named as a defendant herein ("CC-1") to lie to a representative of Mortgage Concepts regarding the employment of ZADRAN's wife in connection with an application for a loan of approximately \$240,000.

b. On or about March 28, 2001, CC-1 falsely stated to a representative of Mortgage Concepts that the wife of NOORULLAH ZADRAN, the defendant, worked in a data processing job at the mission for the Islamic Emirate of Afghanistan.

(Title 18, United States Code, Section 371.)

  
FOREPERSON

  
DAVID N. KELLEY  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

NOORULLAH ZADRAN,

Defendant.

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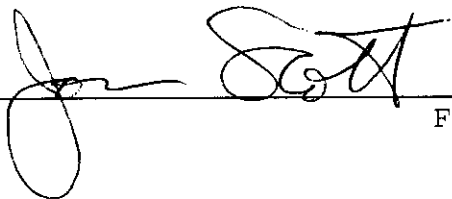
INDICTMENT

S1 04 Cr. 1185 (LAP)

(26 U.S.C. § 7206;  
18 U.S.C. § 371.)

\_\_\_\_\_  
DAVID N. KELLEY  
United States Attorney.

A TRUE BILL

\_\_\_\_\_  
  
Foreperson.

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*Feb. 14, 2005*

*Filed Superseded Indictment in S1 04 CR 1185 (LAP)*

*Freeman, USMJ*